

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WILLIAM F WINGATE,
Plaintiff,

v.

CYNTHIA WHITLATCH,
Defendant.

CASE NO. C15-822 RAJ

SPECIAL VERDICT FORM

We, the jury, answer the questions submitted by the Court as follows:

QUESTION 1: Did Ms. Whitlatch violate Mr. Wingate's Fourteenth Amendment Equal Protection rights?

ANSWER: Yes ☒ No ☐

1 **QUESTION 2:** Is Ms. Whitlatch liable to Mr. Wingate under the Washington Law
2 Against Discrimination?

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4 **ANSWER:** Yes ✓ No _____

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7 *If you answered "yes" to Question 1 or 2, answer Question 3. If you answered "no" to*
8 *Question 1 and 2, sign and date the verdict form.*

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11 **QUESTION 3:** Was Cynthia Whitlatch's conduct toward Mr. Wingate the proximate
12 cause of any damages he sustained?

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14 **ANSWER:** Yes ✓ No _____

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17 *If you answered "yes" to Question 3, answer the following question. If you answered*
18 *"no" to Question 3, sign and date the verdict form.*

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21 **QUESTION 4:** Please state the amount that will fairly compensate Mr. Wingate for any
22 injury he sustained as a result of Cynthia Whitlatch's conduct for violating his rights
23 under either federal or state law.

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25 **AMOUNT:** \$ 325,000
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1 *If you answered "yes" to Question 1, answer Question 5.*

2
3 **QUESTION 5:** Did Cynthia Whitlatch act maliciously or in reckless disregard of Mr.
4 Wingate's federally protected rights?
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7 **ANSWER:** Yes _____ No ☒ _____.

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9 *If you answered "yes" to Question 5, answer Question 6. If you answered "no" to*
10 *Question 5, sign and date the verdict.*
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12 **QUESTION 6:** Do you award punitive damages against Cynthia Whitlatch?
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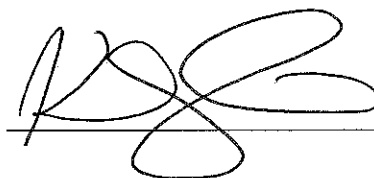
14
15 **ANSWER:** Yes _____ No _____

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17 *If you answered "yes" to Question 6, answer Question 7. If you answered "no" to*
18 *Question 6, sign and date the verdict.*
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1 **QUESTION 7:** If you answered yes to Question 6, what is the amount of punitive
2 damages?

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4 **AMOUNT:** \$ _____
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7 Dated this 8th day of November, 2016.

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10 _____

11 Presiding Juror
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